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CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

22 || CITY AND COUNTY OF SAN FRANCISCO.

Case No. 3:24-CV-02311-TSH

23 Plaintiff,

**DECLARATION OF RYAN C. STEVENS IN
SUPPORT OF PLAINTIFF'S CITY AND
COUNTY OF SAN FRANCISCO'S
ADMINISTRATIVE MOTION TO CONTINUE
HEARING ON DEFENDANT CITY OF
OAKLAND'S MOTION FOR SUMMARY
JUDGMENT**

24

25 CITY OF OAKLAND AND PORT OF
OAKLAND,

Defendants.

28 AND RELATED COUNTERCLAIM

1 I, Ryan C. Stevens, hereby declare as follows:

2 1. I am a member in good standing of the State Bar of California and am admitted to
 3 practice before this Court. I am an associate at the law firm of Cooley LLP, counsel for the City
 4 and County of San Francisco (“San Francisco”) in the above-captioned action. Pursuant to Civil
 5 Local Rules 6-3 and 7-11, I make this Declaration in support of San Francisco’s Administrative
 6 Motion to Continue Hearing on Defendant City of Oakland’s Motion for Summary Judgment. I
 7 have personal knowledge of the facts contained herein and if called as a witness would and could
 8 testify competently thereto.

9 2. On November 8, 2024 I met and conferred with counsel for the City of Oakland by
 10 phone and requested a stipulation to briefly continue the motion for summary judgment so that the
 11 parties could ascertain whether an order on the motion for preliminary injunction would either moot
 12 the issue or open a path to resolution that would not require motion practice. I also explained San
 13 Francisco’s position that it was too early in the case to file for summary judgment because the
 14 parties had not engaged in discovery. In the alternative I requested a brief continuance as a courtesy.
 15 The City of Oakland refused to agree a continuance.

16 3. On November 10, 2024, I wrote to counsel for the City of Oakland, asking that
 17 counsel reconsider their refusal to enter a continuance and again requested a continuance. Given
 18 the timing of San Francisco’s deadline to oppose, San Francisco explained that they would file this
 19 administrative motion if they did not hear a response from the City of Oakland by November 11,
 20 2024 at 12:00 PST. A true and correct copy of my email exchange with counsel for the City of
 21 Oakland is attached as **Exhibit A**. As of the time of this filing, the City of Oakland has not
 22 responded to this communication.

23 4. San Francisco’s opposition to the City of Oakland’s motion for summary judgment
 24 is due on November 13, 2024, and the hearing is noticed for December 5, 2024.

25 5. The parties have not yet had an initial case management conference, engaged in a
 26 Rule 26(f) conference, or exchanged initial disclosures.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 November 11, 2024, in San Francisco, California.

3 */S/Ryan Stevens*
4 Ryan Stevens

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